

**EXHIBIT
904****J. Winer**
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EXPERT REPORT - BACKGROUND AND EXPERIENCE

I am a Senior Vice President in the international consulting firm of APCO Worldwide in Washington, D.C., where I specialize in domestic, foreign, and cross-border financial regulatory issues, including the regulation of financial institutions to combat money laundering and terrorist finance, both domestically, and internationally, as well as the application of U.S. economic sanctions against terrorists and their facilitators. Previously, I was Deputy U.S. Assistant Secretary of State for International Law Enforcement from 1994 through 1999. In that position, I served as the principal policy-maker focused on a daily basis on international organized crime and financial crime for the State Department, including money laundering, the systems used for terrorist finance, and mutual legal assistance and international cooperation against transnational threats such as crime and terrorism. From 1985 through 1994, I served as counsel to Senator John Kerry, where I conducted a number of investigations on cross-border financial crime, in addition to staffing him on legal, banking, and foreign affairs issues. Between 1999 and 2008, I was a counsel and then partner at the law firm of Alston & Bird LLP, where I practiced law in these subject matter areas.

During my tenure in the Clinton Administration, I handled oversight of U.S. law enforcement relations with many nations. At the request of the National Security Council of the White House ("NSC") and/or the Office of the Vice President ("OVP"), I chaired numerous interagency working groups on trans-border law enforcement and crime issues, as well as bilateral and multilateral groups working on these issues with foreign counterparts. My work included developing responses by the government of the United States to criminal conspiracies directed at our government or our people from overseas; tracking such criminal activity; obtaining evidence regarding it; obtaining cooperation from other countries on trans-border criminal activity, including the sharing of financial records and other information across borders; and initiating and overseeing overt and covert operations to control and combat trans-border criminal activity emanating from overseas.

During my tenure in this position, I represented our government in negotiations taking place in 40 countries on five continents, carried out direct bilateral negotiations and discussions with representatives of some 80 countries in the U.S. and overseas and multilateral negotiations with representatives of the member states of the United Nations, the Organization of American States, Caricom, and the G-8. That work included development and oversight of U.S. anti-money laundering policy internationally, including U.S. policy regarding the Financial Action Task Force ("FATF"), based in Paris, the world's premiere anti-money laundering body, which at the time was undertaking assessments of the money laundering regulation of its member countries. My work included on-site visits to discuss money laundering and terrorist finance reforms, including the need to waive bank secrecy in cases involving serious criminal activity or terrorism, in Cyprus, Israel and Lebanon, among many other countries.

One recurring issue was the need for the U.S., as well as the need of all countries, to trace financial transactions from jurisdiction to jurisdiction regardless of where the records were maintained. Accordingly, we worked systematically to strengthen international mechanisms for the exchange of banking information, as well as the ability of the U.S. to obtain evidence for legal cases in the U.S. from other countries.

I was involved in several initiatives to combat the negative impact that bank secrecy was having on U.S. interests in preventing and suppressing international organized crime and terrorism. These included participating in the

process by which the U.S. worked with the FATF to target countries that would not waive bank secrecy, to force them to change their domestic legal regimes to permit bank secrecy to be waived. Through my work as head of the U.S. delegation to the Lyon Group of the G-8 from 1995 through 1999 and as head of the U.S. delegation to the UN Crime Commission in the same period, I also initiated a process that resulted in the successful negotiation of the Transnational Organized Crime Convention, with the express purpose of ensuring that countries who became party to that instrument would agree not to protect bank records from disclosure in cases involving serious organized crime, including terrorism.

EXPERIENCE IN US FOREIGN POLICY PROCESS

During my six-year service as U.S. Deputy Assistant Secretary of State, I met daily with other senior policy makers at the State Department to discuss foreign policy issues involving the response of the U.S. government to foreign governments, officials, businesses, and persons involved in planning or carrying out criminal activity directed at the United States and/or its people. I also worked on a daily basis with counterparts at the NSC, Department of Justice, Department of the Treasury, the U.S. Department of Commerce, the Department of Defense, the Central Intelligence Agency ("CIA"), and other components of the U.S. intelligence community. The work included daily contact with senior officials from the major U.S. federal law enforcement agencies, which at the time included the Federal Bureau of Investigation, Drug Enforcement Administration, Customs, Secret Service, the Bureau of Alcohol, Tobacco and Firearms, the Coast Guard, and the Immigration and Naturalization Service ("INS").

During this period, I chaired or was an active participant in many interagency meetings involving these and other U.S. agencies, and led numerous interagency missions at home and overseas regarding international criminal activity. This work included leading or participating in delegations involving the United States and the UN, EU, Council of Europe, FATF, Organization of American States, Caricom, G-7 and G-8 and other modalities.

PREVIOUS BACKGROUND

I first became involved in international money laundering matters in 1980, while I was working as an associate, while still in law school for the U.S. Attorney in Denver, Colorado on a bank fraud case involving the use of offshore banks in the Caribbean to launder funds and defraud U.S. banks and investors. At that time, I received training from senior investigators from the FBI and the Office of the Comptroller of the Currency, responsible for regulating U.S. banks. In 1980 and 1981, while working as a journalist writing about legal affairs. I first developed expertise in the application of U.S. sanctions laws arising out of the Iranian hostage crisis and the use by the United States of the International Emergency Economic Powers Act ("IEEPA") to freeze Iranian assets prior to the resolution of the crisis in 1981 with the Algiers Accords. From 1985 through 1994, I worked in the U.S. Senate as counsel to Senator John F. Kerry. During that time, I handled financial regulatory, criminal justice and foreign policy issues in connection with hearings and legislative matters before the Senate Committees on Foreign Relations, Judiciary, and Banking, I drafted legislation to strengthen U.S. law against international money laundering and financial crime. I also chaired or staffed a series of investigations into international money laundering and serious transnational criminal activity affecting the United States and Americans. These international investigations included matters pertaining to the Iran/Contra Affair, drug trafficking and money laundering of Panamanian dictator Manuel Noriega and other money laundering abuses in Panama, and illicit financial activities and corruption involving a major international bank, BCCI, in Asia, Africa, Latin America, North America, Europe and the Middle East.

This work substantially focused on the intersection of foreign policy and law enforcement, and their relationship to money laundering and terrorism, and the negative impact that foreign bank secrecy was having on major U.S. foreign policy objectives. In the late 1980s, I drafted a substantial portion of a report relating to these issues, published in 1988 by the Senate Committee on Foreign Relations Subcommittee on Drugs, Terrorism, and International Operations, with the title "Drugs, Law Enforcement and Foreign Policy." Later, I drafted the preponderance of the U.S. Senate report on BCCI, "The BCCI Affair," issued by Senators Kerry and Brown, which included chapters on how BCCI engaged in criminal activity, facilitated terrorist finance and nuclear proliferation, and evaded British financial regulation.

During my service as a counsel in the Senate, the Congress recurrently worked to strengthen the domestic and international regime to counter terrorism and terrorist finance, and supported efforts to curtail the ability of bank secrecy to protect terrorists, through hearings, investigations, and in domestic legislation.

POST-GOVERNMENT EXPERIENCE

During the time I practiced law at Alston & Bird L.L.P., from November 1, 1999 through May 2008, I was asked by clients to provide expertise regarding money laundering and terrorist finance enforcement and regulation in the United States and globally. In connection with that work, I have reviewed the examination procedures of U.S. regulators, and financial institution compliance practices in the United States, Europe, Asia, the Middle East and Africa, as well as the application of the 40 Recommendations of the FATF by FATF member states, and a number of the assessments of national regulatory and compliance practice made by the FATF in recent years. I have been called upon to render advice to financial institutions regarding their obligations to counter money laundering and terrorist finance, both statutory and regulatory, as well as to describe existing global best practices for compliance. I was called upon to handle matters pertaining to the application of UN and U.S. sanctions regarding terrorist funds, administered in the U.S. by the Office of Foreign Assets Control (“OFAC”) of the Treasury Department. I provided informal assistance to the UK liquidator of BCCI in connection with the liquidator’s ongoing efforts to secure compensation for BCC’s depositors. I was also asked by one client to assess the anti-money laundering and counter terrorist-finance systems of more than 100 countries in work that extended over a total period of some six years.

During the time I have undertaken consulting services at APCO Worldwide, I have maintained my involvement in anti-money laundering and terrorist finance issues through ongoing informal contacts with senior U.S. Treasury officials responsible for these areas that have continued through 2012. I have advised foreign financial institutions in Europe and the Middle East on amelioration in connection with U.S. investigations relating to money laundering and tax evasion, as well as other foreign financial institutions, located in Europe and Central Asia, seeking to put in place programs to limit money laundering risk. I have continued teaching students at the Central Intelligence Agency regarding international corruption, money laundering, and financial crime issues, which I undertake several times a year. As detailed below, have also continued publishing in the field, with my most recent publications, issued published in 2010, focusing on money laundering issues in Mexican financial institutions for Georgetown University (CSIS), and on Chinese illicit finance for Centra Technology, in a paper commissioned by the U.S. government. I undertook work for the World Bank and the United Nations in 2009 and 2010 to provide them recommendations on enhancing its Stolen Assets Recovery Initiative, and chaired a panel of the Global Forum on Corruption in Doha, Qatar, also in 2009 dealing with corruption and financial crime. I also moderated the development of Supply Chain Guidelines relating to the global mining sector for the OECD in Paris in 2010.

I have previously qualified as an Expert Witness on terrorist finance and money laundering issues in the United Kingdom in 2004 in the matter of *Al Rajhi Banking and Investment Corporation vs. The Wall Street Journal Europe SPRL*, a proceeding before the High Court of Justice, Queen’s Bench Division, London involving terrorist finance issues and the Al Rajhi bank. I also qualified as an expert witness in the case of *Cal X-tra, et al. v. Phoenix Holdings* before The Superior Court, Maricopa County, Arizona in 2007, and in the case of *Lebrija v. Financial Technology Ventures L.P.*, an arbitration held in 2008 under the rules of the American Arbitration association. The Cal X-tra case involved matters relating to money laundering and financial crime in off tax havens. The Lebrija case involved issues relating to due diligence in connection with money services business in Latin America.

RECENT TESTIMONY AND PUBLICATIONS

Since leaving the U.S. government, I have continued to provide my expertise in the area of money laundering, terrorist finance, and sanctions laws to governments and to international institutions. This has included providing assistance regarding money laundering, illicit finance, and terrorist finance to the U.S. intelligence community, the Treasury Department, the Justice Department, the NSC, the U.S. House of Representatives, the U.S. Senate, the World Bank., and the United Nations, as well as to the Governments of Russia and Indonesia in connection with the development of their domestic money laundering laws and regulations. After the September 11, 2001 terrorist attacks (“September 11 attacks”), the Senate Committee on Banking, Housing and Urban Affairs asked me to testify in connection with Congress’ response to the September 26, 2001, 11 attacks, My testimony on terrorist finance was given to the Senate on September 26, 2001. and became part of the record relied upon by the Congress in connection with its consideration of the Patriot Act. Title III of the Patriot Act as enacted included provisions whose adoption I had advocated during my time in the Clinton Administration. I also testified on the issue of terrorist finance and money laundering was before the House International Affairs Committee’s Subcommittee on Oversight and Investigations on March 29, 2006, in a hearing entitled “Offshore Banking,

Corruption and the War on Terrorism.”

On July 31, 2003, I testified before the U.S. Senate Committee on Government Affairs, providing my opinion on the origins, organization, and prevention of terrorist finance. I also have served as a Task Force Member, Council on Foreign Relations Task Force on Terrorist Finance (2002-2004); on the Steering Committee, CSIS Transnational Threats Initiative (2002-present); as a Task Force Member, Council on Foreign Relations Andes 2020 Commission (2003); and on the Atlantic Council Working Group, “The War on Terrorism: Strategic Questions, Issues, and Implications,” (2005-2006); where my expertise has been called upon in the areas of trans-border terrorist and criminal activity, money laundering, and rule of law issues. In 2006 and 2007, I worked on a project with CSIS to study developments in terrorism in Europe through the exchange of open-source data with other terrorism experts, including a number of other former senior government officials from the U.S. specializing in counter-terrorism. In 2008, I continued to work on a related project studying developments in terrorism in Southeast Asia with CSIS and the Singapore-based International Institute for Strategic Studies (ASIA). In 2007 and 2008, I provided expertise to the Government of Russia on various anti-money laundering compliance issues through the Financial Services Volunteer Corps, providing my views to senior officials of various Russian government agencies in country. I have continued that work as recently as last year, providing views to the Government of Russia and its Parliament in March 2011 on proposed Russian regulations governing cashless money transmittals.

Since the September 11 attacks, I have also been asked by a number of organizations and publications to provide written analysis of terrorist finance, money laundering, and transnational criminal issues. Relevant articles I wrote and published include but are not limited to:

“Illicit Finance in China,” a study for Centra Technology, September 2010; “Mexican Money Laundering: A Study in Cross-Border Currency Flows, a Permeable Financial Services Sector,” Center for Strategic and International Studies, Professor Sydney Weintraub (November 2010); “An Initial International Cooperation Agenda on High Consequence Events for the Obama Administration,” PACER National Center of Excellence on Homeland Security, Johns Hopkins SAIS (January 2009); “Countering Terrorist Finance: A Work, Mostly in Progress,” article in *The Annals of the American Academy of Political and Social Science*, July 2008, in volume “Terrorism: What the Next President Will Face;” “Diplomatic Expulsions Highlight Need for US to Re-Engage with Latin America,” September 14, 2008; “EU High Court Invalidates Sanctions Against Al Qaeda,” “The Urgent Need for a Broader Counterinsurgency Approach in the FATA,” September 2, 2008; “*Boumediene v. Bush*, Another View -- Judicial Oversight of Terrorist Detainment Essential to Freedom,” June 16, 2008; “EU Agrees to Join US Iran Sanctions, Iran Gets Funds Out of Town,” June 10, 2008; “In Southeast Asia, a Counterterrorism Strategy That’s Working,” June 9, 2008 (all in Counter-Terrorism Blog); “UK Court Invalidates Terrorist Asset Freezing Regime as Unconstitutional,” April 24, 2008; “Indonesia Bans Jemaah Islamiyah After Malaysia Arrests Leaders On Way to Syria,” April 21, 2008; “Ecuador Publishes FARC Commanders ‘Brotherly Greetings,’” April 11, 2008; “New information on FARC Support For Ecuador Presidential Campaign,” April 10, 2008; “FARC Uranium May Be Depleted, But It’s Still Nuclear Material,” March 28, 2008; “Colombia Announces Find of 66 Pounds of Uranium It Says Linked to FARC,” March 26, 2008; “The FARC’s Terrorist Diplomacy,” March 18, 2008; “FARC allegations multiply, require vetting,” March 10, 2008; “Provocative material in FARC computers needs broad disclosure and analysis,” March 7, 2008; “U.S. reportedly skeptical about the dirty bomb allegation,” March 5, 2008; “Growing International Free-For-All, As Charges Mount On Chavez Laundering and Terrorist Ties,” March 4, 2008, “Al-Qadi Ruling Threatens EU and Ultimately UN Terrorist Sanctions Process,” January 16, 2008 (all in Counter-Terrorism Blog); “Bhutto Murder Fits Pattern of Lashkar I Jhangvi Terrorism, With Nasty Implications,” December 28, 2007; “Benazir Bhutto’s Assassination -- a Lethal Assault on Democracy,” December 27, 2007; “In Stunning Move, UN and US Delist Nasreddin and His Companies from Sanctions,” November 16, 2007; “Canada’s FinTrac Public Info Limited by Canadian Law,” November 4, 2007; “Did Syria Have Visible WMD Program Prior to US Invasion of Iraq?,” October 28, 2007; “Treasury Sanctions On Iran Will Have Commercial Impact For Foreign Banks,” October 25, 2007; “Economic Sanctions and Iranian Containment,” August 29, 2007; “The Threat of ‘Homegrown,’” June 3, 2007; “Is U.S. Supporting Brotherhood Activities in Syria?,” March 11, 2007; “Treasury’s Message About Iran: ‘Be Afraid,’” March 9, 2007; “Bangladesh Stalled on Enacting Terrorist Finance Law,” February 25, 2007; “Treasury Hits Iran With Another Proliferation Freeze,” February 16, 2007; “The Pakistan Taliban” February 14, 2007; “Writing Now on Wall for Handling of Iranian Assets,” February 13, 2007; “E Undertakes Major Assault on PKK, Backed By US,” February 11, 2007; “Regulators Provide Current Stats on Results of BSA Reporting,” February 9, 2007;

“Treasury Seeks \$ to Hire New Specialists on Rogue States,” February 6, 2007; “EU Privacy Czar Claims Right to Prohibit US Access to EU Financial Records,” February 1, 2007; “Is Treasury Bank Freeze Real or Phony Issue Stalling NK Talks?,” January 29, 2007; “CIA, Military Reveal Acquisition of Domestic Bank Records,” January 14, 2007; “The ‘Material Support’ Test for Terrorism,” January 11, 2007; “14 billion Iranian Bank Sepah Hit by US Sanctions,” January 9, 2007; “Treasury Uses Sanctions Authority to Name More Syrian Proliferators,” January 8, 2007; “Beach Bank Case Highlights Laundering Risk of Phone Cards,” January 3, 2007 (all in Counter-Terrorism Blog); Advisory, “FinCEN Issues Clarification of Securities and Futures Industries Due Diligence Obligations Under § 312 of the USA PATRIOT Act,” Alston & Bird, June 20, 2006. “Federal Financial Institutions Examination Council Releases 2006 Releases to the Bank Secrecy Act,” Electronic Banking Law and Commerce Report (West Legalworks), September 2006 (Kathryn Marks, coauthor); “EU Strikes Down Terrorist Finance Designation of Iranian Opposition,” December 12, 2006; “UK Banks Bowing to Risk of Action from US on Iran,” December 4, 2006; “European Privacy Czars Seek to Stop Terror Finance Monitoring,” November 29, 2006; “Australia Finds US Pressure on Iran Having an Impact,” November 26, 2006; “Clarifying the Status of Arab Bank in the U.S.,” November 17, 2006; “Isolating Iranian Banking Activities,” November 14, 2006; “Counter Insurgency and Counter Terrorism in Europe,” October 15, 2006 (all in Counter-Terrorism Blog); “Toughened U.S. Money Laundering Regime Driving New Global Enforcement Standards” in the Euromoney Global Banking & Financial Policy Review 2005/06; (with John L. Douglas); “Cleaning Up the UN,” Washington Times (March 4, 2005); “The Evolution of Trans-Atlantic Law Enforcement and Judicial Cooperation,” in Transatlantic Homeland Security (2005); “Tracking Conflict Commodities and Financing,” in Profiting From Peace (Lienne Rienner, 2005); “Old Rules, New Threats: Building Global Jurisdiction, Systems and Capacity To Build Global Security’s Council on Foreign Relations/American Society of International Law (March 2003); “Finance of Illicit Conflict,” World Bank (December 2002); “Globalization, Terrorist Finance, and Global Conflict,” in the Financing of Terrorism, Special Issue on Criminal and Regulatory Law Reform of the European Journal of Law Reform, Geneva Volume 4, Issue 2); “International and Domestic Efforts to Combat Terrorist Finance Since 9/11,” Survival, International Institute for Strategic Studies (Vol. 44, Number 3) (Autumn 2002) (coauthored with Dr. Triffin Roule); “Review of International Money Laundering,” Strategic Survey, London, (Spring 2002) (coauthored with Dr. Triffin J. Roule); “Illicit Finance and Global Conflict,” Programme for International Co-operation and Conflict Resolution, Faro Institute for Applied Social Science, Oslo, Norway, Report 380, (March 25, 2002); and “How To Clean Up Dirty Money,” Financial Times (March 22, 2002).

OTHER PUBLIC INVOLVEMENT IN TERRORIST FINANCE ANALYSIS

In the United States and in many other countries, terrorist finance issues have been of central public interest and importance since the September 11 attacks, by Al Qaeda on the World Trade Center in New York and the Pentagon in Arlington, Virginia. Accordingly, I have been asked to brief and to provide my assessments and analysis on terrorist finance to numerous reporters representing the media of many countries. As a result, I have been quoted on terrorist finance issues in such publications as the Atlanta Constitution, The Boston Globe, The Chicago Tribune, Christian Science Monitor, The Financial Times, The Houston Chronicle, The London Times, The Los Angeles Times, Newsweek, The New York Times, Time, U.S. News and World Report, The Wall Street Journal, and The Washington Post. I have appeared on internationally-broadcast cable and satellite media, including the BBC, CNN, ABC-News, CBS-News, Fox News, NBC-News, and National Public Radio. I was the on-air consultant on terrorist finance issues for ABC-News in the period September 2001-December 2001, appearing regularly on each of ABC’s internationally broadcast news programs. In addition to working with reporters from United States publications, I have talked with reporters covering terrorist finance issues for their readers in many other countries and my views have been disseminated in literally hundreds of articles about terrorist finance. I have lectured widely on the topic of terrorist finance and money laundering. In the period November 1999 to the present, these lectures have included speaking on these issues at American Banker; American Bar Association Committee on Law and National Security; Argentine National School of Intelligence; Atlantic Council; Brookings Institution; Bureau for National Affairs; Canadian Center for International Peace and Security, Canadian Institute of International Affairs; Center for Peace and Security Studies (“CPSS”); Center for Strategic and International Studies (“CSIS”); CIA-Kent School; Council on Foreign Relations; Georgetown University; George Washington University; Global Forum Against Corruption (Doha); Harvard University-Kennedy School of Government; the International Institute for Strategic Studies (IISS-Asia); International Islamic Finance Forum; Jane’s Defense Seminars; Jesus College, Cambridge University; Johns Hopkins University School of Advanced International Studies (“SAIS”); National Association of Clearing Houses (NACHA); National Defense University; New York University; Organization for Cooperation and Development (“OECD”) in Paris; Princeton University; University of London, School of Advanced International Legal Studies; Strategic

Research Institute (“SRI”); Thomson Financial; United Nations (New York and Vienna); University Center for International Studies (University of Pittsburgh; U.S. Institute of Peace; among others.